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*Lead Counsel for Court-Appointed Lead Plaintiff and the Class*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE TEZOS SECURITIES LITIGATION

This document relates to:

ALL ACTIONS.

Master File No. 17-cv-06779-RS

**CLASS ACTION**

**DECLARATION OF HUNG G. TA IN  
OPPOSITION TO DEFENDANTS'  
MOTIONS TO DISMISS**

Date: April 14, 2019  
Time: 1:30 p.m.  
Crtrm: 3  
Judge: Hon. Richard Seeborg

1 I, Hung G. Ta, declare under penalty of perjury as follows:

2 1. I am the principal of the law firm Hung G. Ta, Esq. PLLC (“HGT Law”), counsel for  
3 named plaintiffs Pumaro LLC and Artiom Frunze (“Plaintiffs”). I am an active member in good  
4 standing of the bar of the State of New York and have been admitted *pro hac vice* in this matter. I  
5 submit this declaration in support of Plaintiffs’ motion for class certification.

6 2. Attached hereto as Exhibit A is a true and correct copy of a July 24, 2017 update from  
7 the Tezos Foundation.

8 3. Attached hereto as Exhibit B is a true and correct copy of the Tezos Overview.

9 4. Attached hereto as Exhibit C is a true and correct copy of a thread on reddit.com  
10 bearing the bates range DLS00000409-DLS00000421, produced by Defendant Dynamic Ledger  
11 Solutions, Inc. (“DLS”).

12 5. Attached hereto as Exhibit D is a true and correct copy of the Declaration of Artiom  
13 Frunze, dated January 9, 2019.

14 6. Attached hereto as Exhibit E is a true and correct copy of the Declaration of Pumaro  
15 LLC, dated January 9, 2019.

16 7. Attached hereto as Exhibit F is a true and correct copy of an article by Rebecca  
17 Campbell, entitled *Tezos Receives Funding for Smart Contract System from Polychain Capital’s*  
18 *Digital Currency Fund*, Bitcoin Magazine (Feb. 17, 2017), available at  
19 [https://bitcoinmagazine.com/articles/tezos-receives-investment-smart-contact-system-polychain-](https://bitcoinmagazine.com/articles/tezos-receives-investment-smart-contact-system-polychain-capitals-digital-currency-fund/)  
20 [capitals-digital-currency-fund/](https://bitcoinmagazine.com/articles/tezos-receives-investment-smart-contact-system-polychain-capitals-digital-currency-fund/).

21 8. Attached hereto as Exhibit G is a true and correct copy of an article entitled *Behind*  
22 *the scenes with blockchain upstart*, Tech Crunch, available at <http://tcrn.ch/2tKD9P3>.

23 9. Attached hereto as Exhibit H is a true and correct copy of an article by Gertrude  
24 Chavez-Dreyfuss, entitled *Exclusive: Billionaire investor Draper to participate in blockchain token*  
25 *sale for first time*, Reuters (May 5, 2017), available at [https://www.reuters.com/article/us-tezos-](https://www.reuters.com/article/us-tezos-blockchain-draper/exclusive-billionaire-investor-draper-to-participate-in-blockchain-token-sale-for-first-time-idUSKBN181250)  
26 [blockchain-draper/exclusive-billionaire-investor-draper-to-participate-in-blockchain-token-sale-for-](https://www.reuters.com/article/us-tezos-blockchain-draper/exclusive-billionaire-investor-draper-to-participate-in-blockchain-token-sale-for-first-time-idUSKBN181250)  
27 [first-time-idUSKBN181250](https://www.reuters.com/article/us-tezos-blockchain-draper/exclusive-billionaire-investor-draper-to-participate-in-blockchain-token-sale-for-first-time-idUSKBN181250).

28 10. Attached hereto as Exhibit I is a true and correct copy of an article entitled *Tim Draper:*

1 *There Was Nothing Secretive About Our Purchase of Tezos*, Cointelegraph (Oct. 23, 2017), available  
 2 at [https://cointelegraph.com/news/tim-draper-there-was-nothing-secretive-about-our-purchase-of-](https://cointelegraph.com/news/tim-draper-there-was-nothing-secretive-about-our-purchase-of-tezos)  
 3 [tezos](https://cointelegraph.com/news/tim-draper-there-was-nothing-secretive-about-our-purchase-of-tezos).

4 11. Attached hereto as Exhibit J is a true and correct copy of a January 10, 2017 email  
 5 from Arthur Breitman bearing the bates number DLS00007715, produced by DLS.

6 12. Attached hereto as Exhibit K is a true and correct copy of a March 10, 2017 email  
 7 from Kathleen Breitman bearing the bates number DLS00007719, produced by DLS.

8 13. Attached hereto as Exhibit L is a true and correct copy of a May 23, 2017 email from  
 9 Kathleen Breitman bearing the bates range DLS00007231-DLS00007232, produced by DLS.

10 14. Attached hereto as Exhibit M is a true and correct copy of a July 1, 2017 email from  
 11 Kathleen Breitman bearing the bates range DLS00007391-DLS00007397, produced by DLS.

12 15. Attached hereto as Exhibit N is a true and correct copy of a June 15, 2017 email from  
 13 Defendants Tezos Stiftung (“Tezos Foundation”).

14 16. Attached hereto as Exhibit O is a true and correct copy of a June 27, 2017 email from  
 15 Johann Gevers of the Tezos Foundation bearing the bates range DLS00004804-DLS00004806,  
 16 produced by DLS.

17 17. Attached hereto as Exhibit P is a true and correct copy of a July 5, 2017 update from  
 18 the Tezos Foundation.

19 18. Attached hereto as Exhibit Q is a true and correct copy of a September 30, 2017 update  
 20 from the Tezos Foundation.

21 19. Attached hereto as Exhibit R is a true and correct copy of a January 15, 2017 email  
 22 from Arthur Breitman bearing the bates range DLS00006989-DLS00006990, produced by DLS.

23 20. Attached hereto as Exhibit S is a true and correct copy of a July 1, 2017 email from  
 24 Arthur Breitman bearing the bates number DLS00005061, produced by DLS.

25 21. Attached hereto as Exhibit T is a true and correct copy of a July 2, 2017 email from  
 26 Arthur Breitman bearing the bates number DLS00005395, produced by DLS.

27 22. Attached hereto as Exhibit U is a true and correct copy of a document entitled the  
 28 *Tezos Contribution and XTZ Allocation Terms and Explanatory Notes* (“Contribution Terms”).

23. Attached hereto as Exhibit V is a true and correct copy of a December 29, 2018 excerpt from the Tezos Block Explorer, available at <https://tzscan.io/network?r=50&state=all>, show the number of Tezos nodes run in the United States.

24. Attached hereto as Exhibit W is a true and correct copy of an April 13, 2017 email from Arthur Breitman bearing bates range DLS00007116-DLS00007124, produced by DLS.

25. Attached hereto as Exhibit X is a true and correct copy of the Minutes of the December 19, 2018 case management conference in the state court action, *Tezos ICO Cases*, No. CJC-18-004978, Superior Court of California, County of San Francisco.

26. Attached hereto as Exhibit Y is the Firm Resume for LTL Attorneys.

27. Attached hereto as Exhibit Z is the Attorney and Law Firm Resume for Hung G. Ta, Esq. PLLC.

I declare under penalty of perjury that the foregoing is true and correct, this 9th day of January, 2019.

/s/ Hung G. Ta  
Hung G. Ta